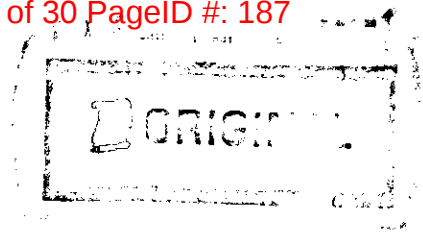


United States District Court
Eastern District of New York



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Zaire Paige

:
:

Plaintiff

- against -

CIV 10 5469

Defendants

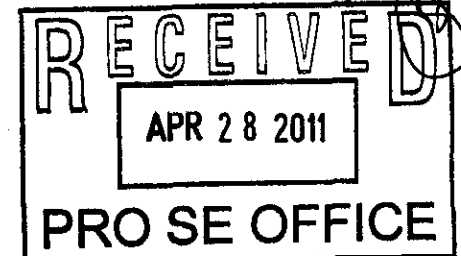
Det. D. Perez
Assistant District Attorney Gough
Police Officer Rashan LaCoste

AMENDED
Complaint

Jury Trial
Demanded

:
:

-----X
I. Parties: Assistant District Attorney Timothy Gough,
Det. Officer Daniel Perez, P. O. Rashan LaCoste



Plaintiff: Asst. D. A. Gough

Residence: Work location
350 Jay Street
Brooklyn, N. Y. 11201

Plaintiff: Rashan LaCoste

Residence: Work location
1470 East New York Avenue
Brooklyn, N. Y. 11212

Plaintiff: Daniel Perez

Residence: Work location
Utica Avenue at Bergan Street
Brooklyn, New York 11235

II. JURISDICTION: EASTERN DISTRICT OF NEW YORK

STATEMENT OF SUMMARY

1. This is a case of action involving Constitutional Rights being violated. Plaintiff, Zaire Paige affirm all events involving this litigation was an act of Official Misconduct on the part of all named in this summons of Complaint to disregard his fundamental rights of a fair trial.

2. During trial starting October 27, 2010 and ending December 2, 2010, plaintiff, Zaire Paige was denied Due Process by Prosecuting District Attorney Timothy Gough, and was maliciously prosecuted based on alledged false accusation.

3. Plaintiff, Zaire Paige is filing this Amended Civil Action to vindicate these wrongs of Official misconduct, to him for a crimes alledged by, New York Police Department personell, Det. Daniel Perez, and Police Officer Rashal LaCoste, and Det. Thomas Donohue

JURISDICTION

4. Jurisdiction of action is in the proper State of New York, county of kings, Brooklyn, since this is the location crime against plaintiff was alledged to have occurred. Plaintiff was arrested, and held without cause of action for more than (5) months.

PARTIES

5. At all time defendant Det. D. Perez was an employee of the City of New York Police Department.

6. During his time of employment defendant alledged by making false accusation against Plaintiff, Zaire Paige, of making statements to him that are untrue.

7. In trial begaining October 27, 2010 through December 2, 2010, defendants Officer Rashan LaCoste, and Det. Danial Perez gave false allegation alledging plaintiff was responsible for a crime that occurred on October 27, 2008 and August 16, 2008.

8. Prosecuting District Attorney, Timothy Gough allowed alledged false accusation to be used knowingly against, Plaintiff of evidence that he knew was based on Police Official Misconduct.

9. Defendants District Attorney, Gough and Officers, violated Plaintiff, Constitutional rights to a fair trial.

10. At all time Officer Rashan LaCoste, and Det. Daniel Perez was employed with the New York City Police Department.

11. Defendants, agency City of New York bears responsiblity of Officers action to maintaining procedurer put in place for a cause of action when Officers commits an Official act of Misconduct.

FACTS OF STATEMENTS BY PLAINTIFF

12. Defendant alledged, plaintiff was at a particular place, when a crime was committed, during testimony at trial stating falsely that plaintiff was arrested, by him (Rashan LaCoste) August 16, 2008, for alledgingly being in possession of (3) to (4) weapons and ammunition.

FIRST CLAIM

13. Defendant LaCoste, alledged during Grand Jury testimony naming plaintiff as being the lone person in possession of these weapons, knowing there is another named person, who was also indictment, but has not been mentioned, creating a false scenario of guilt for the Grand jury to view, plaintiff as being the only person responsible for all (4) weapons in his possession.

14. Defendant, perjured himself while testifing to conflicting information that he confiscated these (4) weapons belonging to plaintiff, under oath.

15. Defendant, Officer LacCoste falsely alledged he took pictures of plaintiff, August 16, 2008, when infact they was obviously taken May 13, 2010 after plaintiff was hospitalized, and under anesthesia for a procedure to have a key removed from the lung, put there in the tortured pistol whipping beating by defendant, May 12, 2011. See Exhibit "A"

SECOND CLAIM

16. Defendant, Det. Daniel Perez, alledged that he telephone, plaintiff to a cellular telephone number during the month of September 5, 2008, but was

unable to produce a bill nor notes of doing so.

17. Defendant, Det. Daniel Perez, also perjured himself on the witness stand by alledging false statement about the cellular telephone number given him by plaintiff.

18. Defendant, alledged that plaintiff was not a target though he was taken from night court, and driven to various Precincts, one being the 77th Precinct, his place of work, being questioned concerning a crime committed in the vicinity of his Precinct work place.

19. Plaintiff, were violated in being transported from place to place, as if commerce under disguise, being view secretly as a potential suspect for the a crime and not being informed of his Miranda Rights, his Constitutional rights.

20. Defendant claimed plaintiff was not a target of this crime, but he was placed in a secret line up under disguise. Plaintiff had been placed secretly in a line up at the various Precinct taken to.

21. Plaintiff was taken to these various Precincts by Defendant, repeating the same method, as plaintiff beleived his Civil right has been violated again and again without regard, being placed in secret of line ups at the 75th Precinct, 77th Precinct, and back to the 73rd Precinct, the origin of his original point resulting in being at night court. Plaintiff was later driven back to night court.

22. Plaintiff were considered a target by Det. Daniel Perez and not as a

witness as claimed during his testimony during trial October 2010. See Exhibit "B".

23. Defendant perjured himself for the purpose of siding with Officer LaCoste and the District Attorney Gough of Official Misconduct to cover up their wrong doings among other things involving plaintiff, alledging, plaintiff committing of the various crimes being tried for.

THIRD CLAIM

24. Defendant, Rashan LaCoste, and Det. Daniel Perez obstructed their own procedurer in committing an Official Misconduct act of tampering with evidence.

25. Assistant District Attorney Gough maliciously prosecuted plaintiff, as he made constant alledge allegation that plaintiff was the sole person responsible for the crime being tried for.

26. Defendant, Gough alledged plaintiff caused injury to individuals who were unable to describe plaintiff, and did not supply a varified statement naming or describing plaintiff of being the person who cause injury to them.

27. Defendant violated plaintiff Constitution rights to all Due Process under the Constitution involving his case while on trial.

28. Defendant alledged that plaintiff was the individual in a video, dvd bearing an object in his left hand, which appeared to have been tampered with.

29. Defendant, also made slanderous allegation concerning plaintiff breaking out of court by gang members. "See Echibit C"

30. Defendant Gough, throughout trial made wild assumption about plaintiff being a powerful and dangerous person.

31. Defendant knew plaintiff were not guilty of any crime, because he was aware of the Official Misconduct of all those who testified against plaintiff.

32. During the second week of trial, plaintiff was denied the right to sit before his jury, (of which were (2) separate one) throughout the rest of his trial, by claims he disrupted the court, after having an outburst, during testimony of his torturer Rashan LaCoste making alleged false accusations against plaintiff.

33. Defendant, Det. Thomas Donohue, and partner signed an unauthorized "General consent for treatment form to have a procedure performed upon plaintiff as he was under anesthesia and in preparation to have a key removed from his lung

34. Plaintiff was denied the verbal offer of signing a waiver to speak on his own behalf, instead he was offered a waiver under the Parker rule, and it was used by the District Attorney and the Judge V. DelGiudice claiming plaintiff signed away his rights to sit before his jury. See "Exhibit D"

35. Plaintiff was made to understand, the waiver being signed was instructing the court to begin without him, if he did not arrive on time of no fault of his own.

36. Court and Assistant District Attorney, instead used trickery to deny plaintiff his Constitutional Rights to appear in court on time, when in fact it

was the Prison who telephoned alledging that plaintiff was refusing to come to court, which was untrue.

37. Prison Ficalty was partner with committing Official Misconduct to prevent the true facts concerning plaintiff being set up to protect all those who are involved.

38. Plaintiff, have been conspired upon by defendants who have partake in a huge conspiracy involving many, to cover up their misdeeds of Official Misconduct for the protection of one another, by exacerbating these crimes against plaintiff for their own good of not being exposed of their wrong doings.

39. Plaintiff is seeking relief for these committed acts against him of violation of his Constitution, rights to conspiracy, sabotage, tampering, and misleading of evidence for the purpose of saving themselves of being exposed of these Official Misconduct.

40. Plaintiff is seeking relief in monatary dameages of 30,000,000.00.

April 28, 2011

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